

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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IN RE: ELECTROLUX HOME  
PRODUCTS ICE MAKER CASES,

:  
:  
: Master Docket No.  
: 1:12-cv-03341-NLH-AMD  
:

:  
: *Consolidated Actions*  
:

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MARIUSZ KUZIAN, JAMES G.

: Case No. 1:12-cv-03341-  
: NLH-AMD  
:

BROWN AND DEBRA A. THOMAS-  
BROWN, on Behalf of Them-  
selves and All Other  
Persons Similarly  
Situated,

:  
:  
: PLAINTIFFS' MOTION FOR  
: PRELIMINARY APPROVAL OF  
: CLASS ACTION SETTLEMENT  
:

Plaintiffs,

v.

ELECTROLUX HOME PRODUCTS,  
INC.,

Defendant.

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IRMA LEDERER,

: Case No. 1:12-cv-03930  
: NLH-AMD  
:

on Behalf of Herself and  
All Other Persons  
Similarly Situated,

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS,  
INC.,

Defendant.

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ROBERT BOVERO, on Behalf  
of Himself and All Others  
Similarly Situated

: Case No. 1:13-cv-02063  
: NLH-AMD  
:

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS,

INC.,	:	
	:	
Defendant.	:	
	:	
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ANTHONY PERLONGO AND ERIC	:	
P. FRANK, individually	:	Case No. 1:13-cv-05677
and on behalf of them-	:	NLH-AMD
and All Others Similarly	:	
Situated,	:	
	:	
Plaintiff,	:	
v.	:	
	:	
ELECTROLUX HOME PRODUCTS,	:	
INC.,	:	
	:	
Defendant.	:	
	:	
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CAMERON WATTERS,	:	Case No. 1:14-cv-00349
Individually and on	:	NLH-AMD
behalf of themselves, and	:	
All Others Similarly	:	
Situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
ELECTROLUX HOME PRODUCTS,	:	
INC.,	:	
	:	
Defendant.	:	
	:	
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Representative Plaintiffs, Mariusz Kuzian, James G. Brown, Debra Thomas-Brown, Robert Bovero, Wanda Roebling, Anthony Perlongo, Eric Frank, Irma Lederer, and Cameron Watters, pursuant to Fed. R. Civ. P. 23(e), respectfully move this Court to enter the proposed Order Preliminarily Approving Class Action Settlement, Conditionally Certifying A Settlement Class, Approving Proposed Notice, And Scheduling Final Fairness Hearing (the "Preliminary Approval Order").

In support of this motion, the Plaintiffs rely upon the accompanying Certification of Bruce H. Nagel ("Nagel Cert.") and the brief submitted herewith.

The Plaintiffs state as follow:

1. The Parties have entered into a Settlement Agreement, which is attached to the Nagel Cert. as Exhibit 1.

2. The relief requested in this motion is assented to by Defendant, Electrolux Home Products, Inc. ("EHP").

3. The Plaintiffs respectfully request that the Court:

A. Grant preliminary approval to the Settlement Agreement as fair, adequate and reasonable;

B. Conditionally certify the Class as defined in the Settlement Agreement for purposes of settlement;

C. Approve the notice plan in the Settlement Agreement at Paragraph VII and the notice forms, which are attached to the Settlement Agreement as Exhibits C, D, E and F, and the Claims Forms which are attached to the Settlement Agreement as Exhibits G and H.

D. Appoint Plaintiffs as Class Representatives and Nagel Rice LLP and Poulos LoPiccolo PC as Co-Lead Class Counsel;

E. Schedule the Fairness Hearing to consider the fairness, reasonableness and adequacy of the Settlement Agreement and whether final approval should be granted, as well as, the application for an award of Attorney's Fees and reimbursement of

expenses and costs and Class Representative Service Awards.

F. Enter the proposed Preliminary Approval Order annexed to the Settlement Agreement as Exhibit A.

Respectfully submitted this 8<sup>th</sup> day of September, 2015.

NAGEL RICE, LLP

By: /s/ Bruce H. Nagel  
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Co-Lead Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Bruce H. Nagel  
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Co-Lead Class Counsel

Dated: September 8, 2015